

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**ERIC LAPRAIRIE, *on behalf of himself and all other
employees similarly situated,***

Plaintiff,

v.

**PRESIDIO, INC., PRESIDIO HOLDINGS INC.,
PRESIDIO LLC, PRESIDIO NETWORKED
SOLUTIONS LLC, PRESIDIO NETWORKED
SOLUTIONS GROUP, LLC, AND PRESIDIO
TECHNOLOGY CAPITAL, LLC,**

Defendants.

NOTICE OF MOTION

No. 1:21-cv-08795-JFK

PLEASE TAKE NOTICE that on August 10, 2022 at 11:30 a.m., Plaintiff in the above-captioned matter, will move this Court, pursuant to Federal Rule of Civil Procedure 23(a), (b)(3), and (e) for an order: (1) certifying the proposed Class; (2) naming Plaintiff as class representative; (3) appointing Thomas & Solomon LLP as Class Counsel; (4) granting preliminary approval to the Settlement; (5) approving the proposed notices; (6) appointing Postethwaite & Netterville as the Settlement Administrator; (7) setting procedures and deadlines of the exclusion and objections of Class Members; (8) scheduling a Final Approval Hearing; and (9) granting such further relief the Court deems reasonable and just.

In support of this motion, Plaintiff will submit a memorandum of law, the Declaration of Jessica L. Lukasiewicz, and the exhibits to the foregoing declaration.

Dated: August 5, 2022

THOMAS & SOLOMON LLP

By: /s/ Jessica L. Lukasiewicz
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